

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
ERIE DIVISION

DEMETRIUS BROWN,)
Plaintiff,)
)
) Complaint
v.)
) Civil Action No. 04-379E
)
U.S. JUSTICE DEPARTMENT,)
BUREAU OF PRISONS, FCI McKEAN)
WARDEN JOHN J. LAMANNA, REGIONAL)
DIRECTOR D. SCOTT DODRILL,)
MEDICAL DIRECTOR, DIRECTOR HARLEY)
G. LAPPIN,)
Defendant.)

I. JURISDICTION

1. This is a civil action authorized by 28 U.S.C. §2675 Tort Claim to redress the personal injury caused by the negligent or wrongful act or omission of the United States Justice Department, Bureau of Prisons, FCI McKean Warden John J. LaManna, Regional Director D. Scott Dodrill, Medical Director, and Director Harley G. Lappin acting within the scope of their office or employment.

The Court has jurisdiction under 28 U.S.C. §1345(b). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. §2201 and 2202.

II. PLAINTIFF

2. Plaintiff Demetrius Brown, has been at all times mentioned herein, prisoner of the United States of America, in the custody of the United States Justice Department, Bureau of Prisons. Plaintiff